

Ackerman, Joyce

From: Ackerman, Joyce
Sent: Wednesday, March 7, 2018 2:26 PM
To: 'Richard Dean'; Thomas J. Krasovec; Dave Folkes; Piggott, Amelia; Jonathan H. Steeler; Tobi L. Moore; Sandusky, Eric; Stovall - CDPHE, Curtis; david.walker@state.co.us; Jenkins, Katherine
Subject: Neuhauser LF - EPA comments on Interim Closure Plan

Dear Mr. Dean – the following are additional comments on the proposed Interim Closure Plan. EPA already provided initial comments on March 5, 2018, regarding the proposed stockpile encapsulant and a question regarding the proposed liners for the excavations.

It is EPA's understanding that the liquids in the frac tank contain CERCLA hazardous substances from spilled chemicals and contaminated groundwater from the Phase 2b drums and excavation. If there were any spills of these liquids from the frac tank from mechanical failure, vandalism, or other causes, it would be a release that would cause a new area of the Site to be contaminated. Accordingly, EPA requires that the liquids in the frac tank be sampled and characterized for proper disposal off-Site, and that disposal take place no later than March 31, 2018. The frac tank may be used for storage of precipitation pooled in the excavations during the temporary closure.

Investigations conducted on 3/7/2018 in Phase 1 (test pitting and PID readings) indicate that elevated levels of contamination are present in the subsurface below the current depth of the excavation floor. Therefore, stockpiled soils may not be placed back in the excavation at this time. Accordingly, the Phase 1 excavation pit will require a liner. (Preliminary information regarding encapsulants indicates that using the proposed product(s) would not achieve the goal of preventing infiltration of precipitation in the Phase 1 excavation.) In summary, the Interim Closure Plan needs to include a liner for the Phase 1 excavation as well as Phases 2a, 2b, and 3.

Air monitoring – as ambient temperatures increase, it will be necessary to conduct periodic air monitoring at the site perimeter to ensure that contaminated soils are not emitting VOCs in unacceptable levels. If there are unacceptable levels, action will need to be taken to address the emissions.

Please provide a revised Interim Closure Plan as soon as possible. EPA intends to release a statement to the Town of Erie in the near future regarding the status of the site, and it needs to include details of the Interim Closure Plan.

Please do not hesitate to contact me with any questions.

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